REMARKS:

In response to the Office Action mailed on January 13, 2006 Applicant wishes to enter the following remarks for the Examiner's consideration. Claims 1-23 are pending in the application.

Claim Rejections 35 USC §102 and 35 USC §103

Claims 14-23 are rejected under 35 USC 102(b) as being anticipated by APA. Claims 1-13 are rejected under 35 USC 103(a) as being unpatentable over APA in view of Halviatti et al. Applicant respectfully traverses these rejections in view of the changes to independent claims 1 and 14.

The claimed invention is an event-driven approach quite different from APA or from the Halviatti et al. reference, whether considered singly or in combination. As explained in the Summary at pages 5-6, the detailed description, and the Abstract at page 20, the present invention teaches the use of pre-stored, programmable events that cause the firmware to autonomously trigger execution of a corresponding pre-stored macro. The firmware monitors hardware states of the fixturing device and in response to any changes to fixturing device hardware states, logged as events pre-stored, the firmware responds to events by autonomously triggering specific macros to execute. The specification teaches that like the macros stored in memory, such as non-volatile memory, pre-stored, programmable events are also stored in memory. When the hardware state change of the fixturing device matches or corresponds to an event stored in memory, a macro corresponding to the event is triggered and executes.

As this is an autonomous process, it runs without the need for controlling software, although outside interaction via the controlling software is also allowed. Moreover, individual custom macros are interpreted at runtime, so that changes to operation of the fixturing device can occur autonomously without having to make changes to the firmware or controlling software of the system. The event-driven approach of the present invention allows for the following:

- the fixturing device to operate without external interaction (autonomously)
- a limited number of commands needed to be sent from controlling software to the fixturing device
- time critical commands to be executed without depending upon controlling software
- the fixturing device to be upgradeable independent of firmware changes
- macro execution in response to stimulus internal to the device

Applicant has amended independent claims 1 and 14 to better claim the autonomous nature of the invention. Claims 24 and 25 were added and correspond to subject matter deleted from independent claim 14. No new matter has been added.
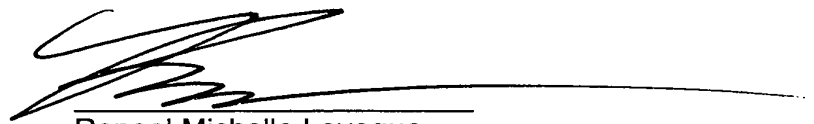
Applicant respectfully submits that the amended claims clearly distinguish over the art of record. The art does not disclose, teach, suggest, anticipate or obviate an autonomous event-driven approach that allows firmware of a fixturing device to autonomously control when macros will be triggered and executed in response to changes in the hardware state(s) of the fixturing device that correspond or match a pre-stored, and potentially programmable, event or events. It is noted that Halviatti is used in the 35 USC 103(a) rejection of claims 1-13 strictly to teach an interpreter residing within a fixturing device. Applicant therefore respectfully submits this reference does not address the shortcomings of APA with regard to the amended claims, described at length above.

In light of the above arguments, Applicant respectfully requests reconsideration and allowance of claims 1, 14 and their dependent claims at the Examiners earliest convenience. Although additional arguments could be made for the patentability of each of these claims, such arguments are believed unnecessary in view of the above discussion of claim 1. The undersigned wishes to make it clear that not making such arguments at this time should not be construed as a concession or admission to any statement in the Office Action.

No amendment made herein was related to the statutory requirements of patentability unless expressly stated herein. No amendment made was for the purpose of narrowing the scope of any claim unless an argument has been made herein that such amendment has been made to distinguish over a particular reference or combination of references.

Please contact the undersigned if there are any questions regarding this response or application.

Respectfully submitted,

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